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VIA ECF

Hon. P. Kevin Castel
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Conference adjourned from 9/9/2022 to 10/28/2022 at 12:30 p.m.
SO ORDERED.
9/8/2022

P. Kevin Castel
United States District Judge

September 7, 2022

RE: Morrison et al v. The City Of New
York , et al/ Dkt. No. 21-cv-10647

Your Honor,

I represent Plaintiff in the above referenced matter. Plaintiff submits this Letter-Motion on behalf of all parties to respectfully request an adjournment of the initial conference in this matter, currently scheduled for September 9, 2022.

The reason for the request is the parties are in the process of adjourning the mediation, currently scheduled for September 21, 2022 with the Mediation Program. The parties are currently awaiting a newly scheduled date. The reasons for adjourning the mediation are as follows: 1) counsel for Defendants is now scheduled for trial on that date; and 2) because counsel for Plaintiff and Defendants have recently substituted their lead attorneys, the parties believe that a mediation taking place before counsel has fully familiarized themselves with the files will not be productive.

As such, the parties believe that in order to preserve the judicial economy, an adjournment of the initial conference is warranted. The parties are of the opinion that the mediation could result in a meaningful negotiation and believe that the ex parte letters/settlement packages are an integral part of preparing for the mediation.

Thus, the parties respectfully request an adjournment of the initial conference to a date convenient to the Court after the revised deadline to complete the mediation has passed. Lastly the parties request that the deadline for the proposed case management order be extended until two (2) days before the rescheduled initial conference date.

This is the parties' second request for an adjournment of the initial conference.

The parties thank this Honorable Court for the consideration of this request.¹

¹ In the event this Honorable Court denies the instant request, the parties have met and conferred regarding the proposed discovery schedule and will be prepared to upload the proposal prior to the September 9, 2022 initial conference.

Respectfully submitted,

/s/

Stephen Liakas

Liakas Law, P.C.